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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 UNITED STATES OF AMERICA,

14 vs.

15 HUNTER H. HALEY,
16 JOSHUA M. TERPSTRA,
17 CAMILLE R. MILLAR,
18 TASEAN E. WITHERWAX,
19 DUSTIN W. RHODES,
20 And
21 NICHOLE M. GOURNEAU,

22 Defendants.

15-CR-00144-SMJ-4
15-CR-00144-SMJ-6
15-CR-00144-SMJ-8
15-CR-00144-SMJ-9
15-CR-00144-SMJ-12
15-CR-00144-SMJ-15

Protective Order Regulating
Disclosure of Discovery and
Sensitive Information Contained
Therein

23 The United States of America, having applied to this Court for a protective order
24 regulating disclosure of the discovery materials and the sensitive information contained
25 therein (the "Discovery") to defense counsel in connection with the Government's
26 discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY**
27 **ORDERED:**
28

1 1. The United States' Motion for Protective Order Regulating Disclosure of
2 Discovery and Sensitive Information is **GRANTED**.

3 2. The United States is authorized to disclose the discovery and sensitive
4 information materials (hereinafter "Discovery") in its possession pursuant to the
5 discovery obligations imposed by this Court.

6 3. Government personnel and counsel for Defendants shall not provide, or
7 make available, the Discovery to any person except as specified in this Order or by
8 approval from this Court. Therefore, defense counsel and the Government shall restrict
9 access to the Discovery, and shall only disclose the Discovery to their client, office staff,
10 investigators, independent paralegals, necessary third-party vendors, consultants, and/or
11 anticipated fact or expert witnesses to the extent that defense counsel believes is
12 necessary to assist in the defense of their client in this matter or that the Government
13 believes is necessary in the investigation and prosecution of this matter.

14 4. Third parties contracted by the United States or defense counsel to provide
15 expert analysis or testimony may possess and inspect the Discovery, but only as
16 necessary to perform their case-related duties or responsibilities in this matter. At all
17 times, third parties shall be subject to the terms of this Order.

18 5. Discovery in this matter will be made available to defense counsel via access
19 to a case file on USA File Exchange. If necessary to review discovery with their
20 respective clients, defense counsel may download the discovery and duplicate only once.
21 Discovery materials may not be left in the possession of the defendants. In order to
22 provide discovery to a necessary third-party vendor, consultant, and/or anticipated fact or
23 expert witness, defense counsel may duplicate the discovery only once. No other copies
24 shall be made, by defense counsel or the defendants, without prior approval from this
25 Court.

26 6. To the extent that defense counsel makes any portion of the Discovery
27 available in paper format to anyone, including their clients, outside of counsel's office,
28 defense counsel shall ensure that any and all sensitive information is redacted or

1 removed. Such redaction/removal shall include, but shall not be limited to, the following:
2 (a) all Social Security, identification card, driver's license, birth certificate, and taxpayer
3 identification numbers; (b) all business and employer names, locations, addresses, as well
4 as salary information; (c) residential and business addresses; (d) all dates of birth, organ
5 donor information, telephone numbers, and email addresses; (e) all lease, bill, or other
6 payment amounts; and (f) all information identifying the contents and routing and
7 account number(s) of any financial account, including bank, trust, and retirement
8 account(s).

9 7. All counsel of record in this matter, including counsel for the United States,
10 shall ensure that any party, including the defendants, that obtains access to the Discovery
11 is provided a copy of this Order. No other party that obtains access to or possession of
12 the Discovery shall retain such access or possession unless authorized by this Order, nor
13 further disseminate the Discovery except as authorized by this Order. Any other party
14 that obtains access to, or possession of, the Discovery once the other party no longer
15 requires access to or possession of the Discovery shall promptly destroy or return the
16 Discovery once access to Discovery is no longer necessary. For purposes of this Order,
17 "other party" is any person other than counsel for the United States, counsel for
18 defendants, or the defendants.

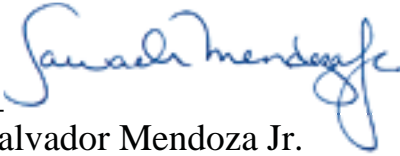
19 8. All counsel of record, including counsel for the United States, shall keep a
20 list to identify each person to whom the Discovery is disclosed and who was advised of
21 the requirements of this Order. Neither counsel for each of the defendants, nor the
22 counsel for the United States, shall be required to disclose this list of persons unless so
23 ordered to do so by the Court.

24 9. Upon entry of a final order of the Court in this matter and conclusion of any
25 direct appeals, government personnel and counsel for defendants shall retrieve and
26 destroy all copies of the Discovery, except that counsel and government personnel may
27 maintain copies in their closed files following their customary procedures.
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1 10. Government personnel and counsel for Defendants shall promptly report to
2 the Court any known violations of this Order.

3 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter this
4 Order and provide copies to counsel.

5 **DATED** this 29th day of January 2016.

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8 Salvador Mendoza Jr.
9 United States District Judge
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